

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**TIFFANY BETH KELLER,**

**Defendant.**

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Civil Action No. 2:22-CV-2141

**JOINT STIPULATION TO ENTRY OF  
CONSENT DECREE AND FINAL JUDGEMENT**

Plaintiff, the United States of America, and Defendant, Tiffany Beth Keller, hereby stipulate to the entry of the attached proposed Consent Decree and Final Judgement (“Consent Decree”).

1. Defendant waives service of the Summons and the Complaint.
2. Defendant acknowledges that she has read the proposed Consent Decree, has had sufficient time to consider its ramifications, understands the proposed Consent Decree, and is prepared to and will abide by all provisions of the Consent Decree.
3. Defendant consents to entry of the attached proposed Consent Decree, freely and without coercion, and waives all rights to seek judicial or appellate review or otherwise challenge or contest the validity of this proposed Consent Decree.
4. Defendant has read, considered, and understands the Complaint. For the purposes of this action, any action to enforce the proposed Consent Decree, any proceeding relating the allegations in the Complaint, and any administrative proceeding relating to the allegations in the Complaint, Defendant admits to the truth of the Factual Allegations in the Complaint.
5. Defendant admits the facts necessary to establish jurisdiction.

6. Each party to this action agrees to bear its own attorney's fees and cost incurred in connection with this action.

Dated: May 6, 2022

  
**TIFFANY BETH KELLER**  
Defendant

**Respectfully submitted,**

**KENNETH L. PARKER**  
**UNITED STATES ATTORNEY**

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